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May 26, 2021

Via ECF

The Honorable Sarah Netburn
Thurgood Marshall United States Courthouse
40 Foley Square, Room 430
New York, NY 10007

Re: *In re Terrorist Attacks on September 11, 2001*, 03-md-1570 (GBD) (SN)

Dear Judge Netburn:

I write on behalf of Defendant Kingdom of Saudi Arabia (“Saudi Arabia”) concerning a sealed filing made by Saudi Arabia today. Today’s filing is a response to the letter-motion filed by Plaintiffs’ Executive Committees (“Plaintiffs”) on May 21, 2021, regarding the schedule for expert disclosures. ECF No. 6816. Saudi Arabia’s filing discusses and attaches excerpts of deposition transcripts that, under the Court’s deposition protocol, are treated as confidential in their entirety for 90 days, pending confidentiality designations by the parties and/or the FBI. Because the confidentiality-designation process for several of the relevant deposition transcripts is ongoing, Saudi Arabia respectfully requests that the Court accept today’s filing under seal under the MDL Protective Order, ECF No. 1900, and the FBI Protective Order, ECF No. 4255.

Saudi Arabia is making today’s filing under seal using the Court’s sealed ECF procedures. Copies of Saudi Arabia’s letter response (clean and with highlighted proposed redactions) are being sent today by email to Your Honor’s chambers, and to counsel for Plaintiffs, the United States, and Dallah Avco. No courtesy copies of either this letter or today’s sealed filing are being sent to the chambers of Judge Daniels, as instructed by the temporary revisions to his Individual Practices in light of the ongoing public health crisis.

Respectfully submitted,

/s/ Michael K. Kellogg

Michael K. Kellogg
Counsel for the Kingdom of Saudi Arabia

cc: All MDL Counsel of Record (via ECF)